

## Exhibit 52

Plaintiffs' Corrected Averment of Jurisdictional Facts and  
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank  
Pursuant to Rule 56.1

~~TOP SECRET~~ [REDACTED]~~(S)~~ AL-HARAMAYN ISLAMIC FOUNDATION - BOSNIA-HERZEGOVINA

DATE:

(U) Statement of the Case:

~~(S)~~ [REDACTED] Based upon information available to the United States government, there is a reasonable basis to believe that the Al-Haramayn Islamic Foundation in Bosnia-Herzegovina (HIF) receives financial support from, and is acting for or on behalf of, is providing financial and material support for, or financial or other services to or in support of, or is otherwise associated with, terrorists and terrorist-related organizations listed in the Annex to Executive Order 13224. While much of the information concerning HIF comes from sensitive sources that cannot be disclosed, the following unclassified information clearly establishes HIF's links to terrorist activity. We believe that this information is generally reliable and, taken as a whole, supports the decision to block the assets of the Al-Haramayn Islamic Foundation in Bosnia-Herzegovina (and its directors). [REDACTED]

~~(S)~~ [REDACTED] The Saudi Arabia-based Al-Haramayn Islamic Foundation non-governmental organization (NGO) is a private, charitable, and educational organization tasked with conveying the true Islamic teachings throughout the world. It derives its name from the Arabic word Al-Haramayn that means the Two Holy Mosques in Makkah and Madinah. [REDACTED]

~~(S)~~ [REDACTED] The NGO is accredited by the UN High Commission for Refugees. [REDACTED]

~~(S)~~ [REDACTED] The Al-Haramayn Islamic Foundation's total expenditures for 2000 exceeded USD 56 million. The Government of Saudi Arabia provided more than one-half of this money via direct contributions and grants through various religious foundations. A growing amount of money now, however, comes from grants from other countries, individual Muslim benefactors, and special campaigns, which target entities around the world. [REDACTED]

~~(S)~~ [REDACTED] The Al-Haramayn Islamic Foundation in Sarajevo, Bosnia-Herzegovina, also directs the so-called "Medina Center" which provides religious education and computer courses. The NGO also rents Dom Na Ilidzi (the Home in Ilidja) where approximately 20 students of the Madrasa in Sarajevo live and prepare themselves for study in one of the Arab countries. In addition to learning Arabic, the preparations for study include a more thorough religious education. [REDACTED]

(U) Identifying Information:(U) A.K.A.:~~(TS)~~ [REDACTED]

Derived by: [REDACTED]

Derived from: [REDACTED]

Declassification: [REDACTED]

~~TOP SECRET~~ [REDACTED]

~~TOP SECRET~~ [REDACTED]

~~(TS)~~ [REDACTED]

(U) Office Locations:

~~(S)~~ [REDACTED] Vrtlarska 2  
Zenica (as of October 1998)  
Bosnia-Herzegovina  
Telephone no.: 172218, 171454  
Telephone no.: 032414760, 032404948, 032420748, 032417152, 032419130,  
032401937 (as of September 2001)  
(operating under the name Centar Za Socijalni Rad or Centar Za Socijaini Rad)

~~(S)~~ [REDACTED]  
(U) Lukovo Polje 32  
72000 Zenica  
Telephone no.: 072\416 652  
Fax no.: 072\418 933

(U) [Source: [www.bbs.bund.de/zenica/kontakt.htm](http://www.bbs.bund.de/zenica/kontakt.htm)]

~~(S)~~ [REDACTED] 14 Bihacka  
Sarajevo (as of November 2001)  
Bosnia-Herzegovina  
Telephone no.: 33 640 578

~~(S)~~ [REDACTED]  
~~(S)~~ [REDACTED] Semira Fraste BB  
Sarajevo (as of mid-October 2001)  
Bosnia-Herzegovina  
Telephone no.: 387-33-235-593  
Number 32 Kasindolska Street  
Ilidza (as of mid-October 2001)  
Bosnia-Herzegovina  
Telephone no.: 387-33-406-680

~~(S)~~ [REDACTED]

~~(TS)~~ [REDACTED]

~~(TS)~~ [REDACTED]

(U) Directors:

~~(S)~~ [REDACTED] Mohamed ABDULRASHID, a.k.a. ABU DALHA  
Director - Sarajevo office (as of September 2001)  
~~(S)~~ [REDACTED]  
~~(S)~~ [REDACTED] Citizenship: Dual Saudi/Bosnian  
Cell Phone no.: 00-387-66-248-157 (as of September 2001)  
~~(S)~~ [REDACTED]

~~TOP SECRET~~ [REDACTED]

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~~TOP SECRET~~ [REDACTED]

[REDACTED]  
[REDACTED]  
(S) [REDACTED] Mohamed SHURAKA, a.k.a. SURAKA  
In Charge of DAWA  
(SHURAKA was the unofficial director of the Al-Haramayn office in Sarajevo  
because the law forbade foreigners to head an office, [REDACTED])

(S) [REDACTED]

(U) Al-Haramayn Islamic Foundation's Ties to Terrorists:

(TS) [REDACTED]

[REDACTED]  
[REDACTED] Additionally, HIF offices in Bosnia-Herzegovina have employed  
personnel with affiliations to or membership in an SDGT (Gama'at Al Islamiyya), indicating that  
the offices of HIF are widely infiltrated by terrorist elements. [(S) [REDACTED]]

(S) [REDACTED] Given our understanding of the relationship between the Al-Haramayn Islamic  
Foundation and Specially Designated Global Terrorists (SDGT) and its potential for exploitation  
by employees with affiliations to or membership in SDGTs, it is reasonable to believe the Al-  
Haramayn Islamic Foundation is acting for or on behalf of, and providing financial and material  
support for, or financial or other services to or in support of terrorist activities and terrorist-  
related organizations, and doing so with the consent, if not active support, of the NGO's  
leadership. Accordingly, the Secretary of the Treasury has the authority to designate the Al-  
Haramayn Islamic Foundation as subject to Executive Order 13224 pursuant to paragraphs (d)(i)  
and (d)(ii) based on a determination that it acts for or on behalf of, and provides financial and  
material support for, or financial or other services to or in support of terrorist activities and  
terrorist-related organizations, or is otherwise associated with those persons listed in the Annex  
to EO 13224. [REDACTED]

~~TOP SECRET~~ [REDACTED]

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